

GMK:MJB:may

**UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

TRAMAINÉ BROWN,	:	CIVIL NO. 1:22-cv-00404
Plaintiff	:	
	:	(Judge Kane)
v.	:	
	:	
UNITED STATES OF	:	
AMERICA, et al.,	:	
Defendants	:	Filed Electronically

**UNITED STATES' MOTION TO DISMISS FOR LACK OF_
JURISDICTION AND/OR FAILURE TO STATE A CLAIM**

Defendant, the United States of America asks this Court to dismiss the Complaint pursuant to Fed. R. Civ. P. 12 (b)(1) and/or 12(b)(6). The United States will file a brief in support of this motion in accordance with M.D. Pa. Local Rule 7.5.

Counsel certifies that she has not obtained concurrence from the plaintiff pursuant to M.D. Local Rule 7.1 because plaintiff is a prisoner proceeding *pro se*.

Respectfully submitted,

Gerard M. Karam
United States Attorney

/s/Michael Butler
Michael Butler
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Date: August 26, 2022

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UNITED STATES OF	:	
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that she is an employee of the Office of the United States Attorney for the Middle District of Pennsylvania and is a person of such age and discretion as to be competent to serve papers. That on August 26, 2022, she served a copy of the attached

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by placing said copy in a postpaid envelope addressed to the person hereinafter named, at the place and address stated below, which is the last known address, and by depositing said envelope and its contents in the United States Mail at Scranton, Pennsylvania.

ADDRESSEE:

Tramaine Brown
Reg. No. 91240-053
FCI Schuylkill-Satellite Camp
Federal Correctional Institution
P.O. Box 670
Minersville, PA 17954

/s/Maureen A. Yeager
Maureen A. Yeager
Paralegal Specialist